

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

ASHEVILLE DIVISION

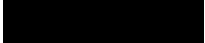
JANE ROE,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil No. 1:20-cv-00666
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	
)	

PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Jane Roe hereby submits her initial disclosures. These initial disclosures are based on the information reasonably available to Plaintiff at this time, and are made without waiving any objections as to relevance, materiality or admissibility of evidence in the action. Plaintiff reserves the right to revise, correct, supplement or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

1. The following individuals are likely to have discoverable information that Plaintiff may use to support her claims and defenses in this action:

Name	Title and Organization	Contact Information	Subject Matter
Jeffrey Minear	Counselor to the Chief Justice, Office of the Counselor to the Chief Justice	1 1st. St. NE, Washington DC 20543 (202) 479-3401	Knowledge of events alleged in complaint and mitigation efforts
Shelly Snook	Special Assistant, Office of the Counselor to the Chief Justice	1 1st. St. NE, Washington DC 20543 (202) 479-3401	Knowledge of events alleged in complaint


Michael Shenkman	Special Assistant, Office of the Counselor to the Chief Justice	1 1st. St. NE, Washington DC 20543 (202) 479-3401	Knowledge of events alleged in complaint and mitigation efforts
James Duff	Director, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 Unknown Phone Number	Knowledge of events alleged in complaint and mitigation efforts
Lee Ann Bennett	Deputy Director, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 Unknown Phone Number	Knowledge of events alleged in complaint
Jill Langley	Judicial Integrity Officer, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 (202) 502-3957	Knowledge of events alleged in complaint
Laura Minor	Associate Director (Ret.), Administrative Office of the U.S. Courts	Unknown Address 	Knowledge of events alleged in complaint
Nancy Dunham	Fair Employment Opportunity Officer (Ret.), Administrative Office of the U.S. Courts	Unknown	Knowledge of events alleged in complaint
Amaal Scroggins	Attorney, Fair Employment Opportunity Office, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 Unknown Phone Number	Knowledge of events alleged in complaint
Cait Clarke	Chief, Defender Services Office, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 Unknown Phone Number	Knowledge of events alleged in complaint

Sheryl Walter	General Counsel, Office of the General Counsel, Administrative Office of the U.S. Courts	1 Columbus Cir., NE Washington, D.C. 20544 Unknown Phone Number	Knowledge of events alleged in complaint
Roger Gregory	Chief Circuit Judge, United States Court of Appeals for the Fourth Circuit	1100 E. Main St. Ste 501 Richmond, VA 23219 (804) 916-2700	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Henry Floyd	Circuit Judge, United States Court of Appeals for the Fourth Circuit	201 Magnolia St. Spartanburg, SC 29306 (864) 591-5300	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Allison Rushing	Circuit Judge, United States Court of Appeals for the Fourth Circuit	100 Otis Street Asheville, NC 28801 Phone Number Unknown	Knowledge of events related to Plaintiff's mitigation efforts
Max Cogburn	District Judge, United States District Court for the Western District of North Carolina	401 West Trade St Charlotte NC 28202 704-350-7400	Knowledge of, and public testimony regarding, misconduct in federal defender office; knowledge of Plaintiff's mitigation efforts
Frank Whitney	Chief District Judge, United States District Court for the Western District of North Carolina	401 West Trade St Charlotte NC 28202 704-350-7400	Knowledge of misconduct in federal defender office
Martin Reidinger	District Judge, United States District Court for the Western District of North Carolina	100 Otis Street Asheville, NC 28801 828-771-7200	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
David Cayer	Magistrate Judge, United States District Court for the Western District of North Carolina	401 West Trade St Charlotte NC 28202 704-350-7400	Knowledge of Plaintiff's mitigation efforts

James Ishida	Circuit Executive, United States Court of Appeals for the Fourth Circuit	1100 E. Main St. Ste 501 Richmond, VA 23219 (804) 916-2700	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Ed Smith	Chief Circuit Mediator, United States Court of Appeals for the Fourth Circuit	[REDACTED] [REDACTED]	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Kim Llewellyn	Human Resources Administrator, United States Court of Appeals for the Fourth Circuit	1100 E. Main St. Ste 501 Richmond, VA 23219 (804) 916-2700	Knowledge of events alleged in complaint
Kimberly Smith	Law Clerk to Chief Judge Gregory, United States Court of Appeals for the Fourth Circuit	1100 E. Main St. Ste 501 Richmond, VA 23219 (804) 916-2700	Knowledge of events alleged in complaint
Heather Beam	Human Resources Specialist, United States District Court for the Western District of North Carolina	401 West Trade St Charlotte NC 28202 (704)-350-7400	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Linda Simpson	Of Counsel, JD Thompson Law	Post Office Box 33127 Charlotte, NC 28233 (704) 641-4359	Knowledge of events alleged in complaint through investigation of Jeff King's EDR complaint
Juval Scott	Federal Public Defender, Office of the Federal Public Defender for the Western District of Virginia	Federal Public Defender's Office 401 E. Market St Suite 106 Charlottesville, VA 22902 (434) 220-3380	Knowledge of events related to Plaintiff's mitigation efforts

Josh Carpenter	Appellate Chief, Office of the Federal Public Defender for the Western District of North Carolina	Grove Arcade Building 1 Page Avenue Suite 210 Asheville, NC 28801 (828) 232-9992	Knowledge of events alleged in complaint
Fredi Sison	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	Grove Arcade Building 1 Page Avenue Suite 210 Asheville, NC 28801 (828) 232-9992	Knowledge of events alleged in complaint
Mary Ellen Coleman	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	Grove Arcade Building 1 Page Avenue Suite 210 Asheville, NC 28801 (828) 232-9992	Knowledge of events alleged in complaint
Nancy Smith	Paralegal, Office of the Federal Public Defender for the Western District of North Carolina	Grove Arcade Building 1 Page Avenue Suite 210 Asheville, NC 28801 (828) 232-9992	Knowledge of events alleged in complaint
Jim Allard	Investigator, Office of the Federal Public Defender for the Western District of North Carolina	Grove Arcade Building 1 Page Avenue Suite 210 Asheville, NC 28801 (828) 232-9992	Knowledge of events alleged in complaint
Anthony Martinez	Federal Public Defender, Office of the Federal Public Defender for the	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint

	Western District of North Carolina		
JP Davis	First Assistant, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Bill Moormann	Administrative Officer, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Peter Adolf	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Cecilia Oseguera	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
W. Kelly Johnson	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Rahwa Gebre-Egziabher	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts

Jared Martin	Assistant Federal Public Defender, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Lisa Ottens	Paralegal, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Ivette Arroyo-Becker	Senior Legal Assistant, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Tony Hellen	Assistant Computer Systems Administrator, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Phil Likins	Computer Systems Administrator, Office of the Federal Public Defender for the Western District of North Carolina	129 West Trade St. Suite 300 Charlotte, NC 28202 (704) 374-0720	Knowledge of events alleged in complaint
Jeffrey King	Assistant Federal Public Defender (former), Office of the Federal Public Defender for the Western District of North Carolina	Unknown Address 	Knowledge of events alleged in complaint
Brian Wise	Investigator (former), Office of the Federal Public Defender for the Western District of North Carolina	Unknown	Knowledge of events alleged in complaint

Elizabeth Blackwood	Assistant Federal Public Defender (former), Office of the Federal Public Defender for the Western District of North Carolina	Unknown Address [REDACTED]	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Terra Parrish	Investigator (former), Office of the Federal Public Defender for the Western District of North Carolina	Unknown Address [REDACTED]	Knowledge of events alleged in complaint
Caleb Newman	Research & Writing Attorney (former), Office of the Federal Public Defender for the Western District of North Carolina	Unknown Address [REDACTED]	Knowledge of events alleged in complaint and Plaintiff's mitigation efforts
Robert Carlin	Assistant Federal Public Defender (former), Community Defender Office for the Western District of North Carolina	Unknown Address [REDACTED]	Knowledge of misconduct by federal defender office
Raquel Wilson	Assistant Federal Public Defender (former), Community Defender Office for the Western District of North Carolina	U.S. Sentencing Commission One Columbus Circle, NE Washington, DC, 20002-8002 (202) 502-4500	Knowledge of events alleged in complaint; knowledge of misconduct by federal defender office
Valerie Nannery	Supreme Court Fellow (former)	American Constitution Society 1899 L St NW Ste 200, Washington, DC 20036 [REDACTED]	Knowledge of events alleged in complaint; knowledge of Plaintiff's psychological harm, emotional distress, humiliation, and embarrassment

Bindu Johnson	Wellness Professional	111 Hotel Hill Dr. Landrum, SC 29356 (864) 896-7926	Knowledge of Plaintiff's psychological harm, emotional distress, humiliation, and embarrassment
Ryan Park	Solicitor General of North Carolina	North Carolina Department of Justice Post Office Box 629 Raleigh, NC 27602 (919) 716-6400	Knowledge of Plaintiff's job performance and Plaintiff's mitigation efforts

2. Plaintiff submits the following description of documents, electronically stored information or tangible things that she may use to support her claims or defenses, by category:

<u>Category</u>	<u>Location</u>
EDR Complaint —including but not limited to filings, supporting documentation, correspondence, notes, recordings.	Office of Plaintiff's Counsel
Documents related to Plaintiff's EDR Complaint in Defendants' possession —including but not limited to AO guidance and communications, investigation report, disqualification, disciplinary action, correspondence between defendants, and EDR Complaint file maintained by EDR Coordinator.	Federal Defender Office/Fourth Circuit Court of Appeals and/or Administrative Office of the U.S. Courts
Correspondence to Defendants —various correspondence to Defendants concerning the claims and issues in the instant suit, including but not limited to claims of harassment, discrimination, and retaliation, efforts to transfer, and mitigation efforts.	Office of Plaintiff's Counsel
Correspondence between Defendants —various correspondence between Defendants concerning the claims and issues in the instant suit, including but not limited to Plaintiff's complaints of harassment, retaliation, and discrimination and any actions taken on those complaints.	Federal Defender Office/Fourth Circuit Court of Appeals/Administrative Office of the U.S. Courts